

EXHIBIT B

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALEJANDRO MANUEL ZAPATA OSORIO, ARTURO DEL
RAZO, BRAULIO ROLANDO CASHABAMBA SHANGO,
BYRON SALVADOR BARRERA SANCHEZ, CARLOS E.
SIERRA RODRIGUEZ, EDWIN FABRICIO CASHABAMBA
TUBON, JESUS SIERRA, JUAN SIERRA, RAMON
ROSALES GALVES, RAUL CHAVEZ DIAZ, SEGUNDO
LEANDRO ALULEMA GUANO, SEGUNDO NICOLAS
SIGUENCIA ENCALADA, AND WILDER RODRIGUEZ
INDIVIDUALLY AND ON BEHALF OF OTHERS
SIMILARLY SITUATED,

Plaintiffs,
-against- Case No.
19-cv-04896-LDH-ST

VECTOR STRUCTURAL PRESERVATION CORP. (D/B/A
VECTOR STRUCTURAL PRESERVATION), NORTH STAR
STRATEGY, INC. (D/B/A NORTH STAR STRATEGY,
INC.) BILL HANDAKAS, BILL HANDAKAS, VASSILIOS
HANDAKAS, AND SERGIO DOE,

Defendants.

-----X
ZOOM VIDEOCONFERENCE

February 11, 2022
11:00 A.M.

EXAMINATION BEFORE TRIAL of the
Plaintiff, WILDER RODRIGUEZ, taken by the
Defendant in the above-entitled action,
held at the above-stated time and place,
pursuant to Court Order, taken before
Karen Blake, a shorthand reporter and
Notary Public within and for the State of
New York.

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED,
by and among counsel for the respective
parties hereto, that the filing, sealing
and certification of the within deposition
shall be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to form of
the question, shall be reserved to the
time of the trial;

IT IS FURTHER STIPULATED AND AGREED
that within the deposition may be signed
before and Notary Public with the same
force and effect as if signed and sworn to
before the Court.

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APPEARANCES:
CSM LEGAL, P.C.

Attorneys for Plaintiffs

60 East 42nd Street, Suite 4510
New York, New York 10165

BY: CLELA ERRINGTON, ESQ.

RABINOWITZ GALINA & ROSEN

Attorneys for Defendants

94 Willis Avenue, Suite 2
Mineola, New York 11501

BY: GAYLE ROSEN, ESQ.

ALSO PRESENT:

ELI NISENOLZ - SPANISH INTERPRETER
EIBER TRANSLATIONS

BILL HANDAKAS

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PROCEEDINGS

THE REPORTER: The attorneys
participating in this deposition acknowledge
that I am not physically present in the
deposition room and that I will be reporting
this deposition remotely.

They further acknowledge that, in lieu
of an oath administered in person, I will
administer the oath remotely.

The parties and their counsel consent
to this arrangement and waive any objections to
this manner of reporting.

MS. ROSEN: So agreed.

MS. ERRINGTON: Agreed.

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2 ELI NISENOLZ, the interpreter, having first been
3 duly sworn by the Notary Public, interpreted
4 from English to Spanish and from Spanish to
5 English to the best of his ability, as follows:
6 WILDER RODRIGUEZ, the Plaintiff, having first
7 been duly sworn by the Notary Public, was
8 examined and testified (through the interpreter)
9 as follows:
10 BY THE COURT REPORTER:
11 Q Please state your full name for the
12 record.
13 A Wilder Rodriguez.
14 Q Please state your current address
15 for the record.
16 A 247 Cumberland Street, Brooklyn,
17 New York 12205.
18 EXAMINATION BY:
19 MS. ROSEN:
20 Q Good morning, Mr. Rodriguez.
21 A Good morning.
22 Q Mr. Rodriguez, normally before
23 COVID we would all be in the same room together,
24 and I would be able to see whether you were
25 looking at any papers or a computer or a cell

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1 WILDER RODRIGUEZ
2 ability to understand my questions?
3 A No.
4 Q Have you failed to take any
5 medicine that you normally take which would
6 affect your ability to understand or answer
7 questions.
8 A No.
9 Q Where were you born?
10 A In Guatemala.
11 Q How long have you been in the
12 United States?
13 A Twenty years.
14 (The requested portion of the
15 record was read.)
16 CONTINUED EXAMINATION BY:
17 MS. ROSEN:
18 Q Are you a citizen of the United
19 States?
20 A No.
21 Q I'm going to ask you for your birth
22 date, but for security and privacy reasons, I'll
23 ask the reporter to only put the year down.
24 A '98. I'm sorry, '78.
25 Q XX/XX/1978 just to confirm?

6

1 WILDER RODRIGUEZ
2 phone. I can't do that when we are on zoom like
3 this, but, I'll ask you not to refer to anything
4 unless you let me know you're doing so.
5 A Okay.
6 Q That reminds me that I should
7 instruct you that all of your responses need to
8 verbal, yes, no or I don't know or something
9 else. The court reporter can't take down shakes
10 of the head or nods of the head or hand
11 gestures. Do you understand?
12 A Yes.
13 Q I'm going to ask since we have the
14 interpreter, even if you understand some English
15 and understand my question that you wait for the
16 interpreter to interpret it into Spanish and I
17 will try to do the same and wait for him to
18 interpret your Spanish response back into
19 English.
20 A Okay.
21 Q This is a deposition, have you ever
22 been deposed before today?
23 A No.
24 Q Are you under the influence of any
25 alcohol or medication that would affect your

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1 WILDER RODRIGUEZ
2 A Yes.
3 Q Do you have a Social Security
4 number?
5 A Yes.
6 Q Again, for security and privacy
7 purposes I'll ask the court reporter to indicate
8 that the witness has answered, but not to put
9 the actual number in the transcript.
10 What is that number?
11 A XXX-XX-XXXX.
12 Q Are you currently employed?
13 A No.
14 Q When was the last time you were
15 employed?
16 A A year ago. One year ago.
17 Q Who was your last employer?
18 A Valley.
19 Q What was Valley?
20 A My boss.
21 Q That's someone's name?
22 A Yes, the owner. The owner of the
23 company.
24 Q What company did he own that you
25 worked for?

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1 WILDER RODRIGUEZ
 2 A Box and Bricks. Well, the actual
 3 name of the company I don't remember. I have
 4 the name in those pay stubs, those checks that I
 5 got from them.
 6 Q What type of work did you do?
 7 A I work with bricks.
 8 Q How long did you work for them?
 9 A Six months.
 10 Q I'm going to ask the court reporter
 11 to leave a space in the transcript and your
 12 attorney will explain to you how to provide me
 13 with the exact name of that company.
 14 (Insert)
 15 CONTINUED EXAMINATION BY:
 16 MS. ROSEN:
 17 A Okay. Yes.
 18 Q Who was your employer before
 19 Valley, the brick company?
 20 A I don't remember.
 21 Q Were you employed in 2018?
 22 A Yes, but I don't remember the name
 23 of that particular company.
 24 Q Do you understand why you're here
 25 today?

1 WILDER RODRIGUEZ
 2 MS. ERRINGTON: He has no way of
 3 knowing what I have. You didn't ask what
 4 he gave me, you asked what I had.
 5 CONTINUED EXAMINATION BY:
 6 MS. ROSEN:
 7 Q Mr. Rodriguez, did you give your
 8 attorney copies of checks, a check or checks
 9 that you received from this company?
 10 A Yes.
 11 Q Do you remember how many check or
 12 checks you gave to your attorney?
 13 A Just one, but in any case she has
 14 all the information.
 15 Q Did you only receive one check or
 16 did you only give your attorney one check?
 17 A Well, they used to pay us by cash
 18 and when they ran out of cash they gave us that
 19 check, but that check bounced, it has no funds.
 20 But in any case, they owed much more than that
 21 amount that we were given.
 22 Q Is the one check that you gave your
 23 attorney the only check you ever received while
 24 working for this company with Sergio?
 25 A That was the only, only one check

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1 WILDER RODRIGUEZ
 2 A Yes.
 3 Q What is your understanding of why
 4 you're here today?
 5 A Because I work for a company in
 6 Yonkers and they didn't pay me.
 7 Q What company was that, that you
 8 worked for in Yonkers that didn't pay you?
 9 A There's a certain individual by the
 10 name of Sergio, the company, he always used to
 11 tell us they're going to pay you, they're going
 12 to pay you. You're going to get paid, you're
 13 going to get paid, but they never did.
 14 Q Just to clarify, you don't know the
 15 name of the company that you worked for in
 16 Yonkers, is that correct?
 17 A There is a check and that check is
 18 in the possession of my counsel, and that check
 19 states the name of the company and the address.
 20 Q Does your attorney have one check
 21 or more than one check from this company?
 22 MS. ERRINGTON: Objection to that.
 23 He has no way of knowing that.
 24 MS. ROSEN: He has no way of
 25 knowing what he gave you?

1 WILDER RODRIGUEZ
 2 we got from them. And again, we were supposed
 3 to get more money, more cash on the account of
 4 our job.
 5 Q Was the Yonkers' job the only job
 6 you worked at for this company?
 7 A Yes.
 8 Q How long did you work at this
 9 Yonkers project for?
 10 A Two months.
 11 Q How many days a week did you go to
 12 this project over two months?
 13 A We had the normal schedule from 7
 14 to 3:30. Because there was some raining days in
 15 between, we didn't work on rainy days. I'm not
 16 able to establish how many days a week.
 17 Q Unless it rained did you work
 18 Mondays.
 19 A Yes.
 20 Q Unless it rained did you work
 21 Tuesdays?
 22 A If it was rain we didn't work.
 23 Q I understand.
 24 If it didn't rain, did you work on
 25 Monday, Tuesday, Wednesday, Thursday, Friday?

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1 WILDER RODRIGUEZ
 2 A Yes.
 3 Q Did you ever work on a Saturday or
 4 a Sunday?
 5 A No.
 6 Q Did you ever start before 7 a.m.?
 7 A No, we got there at 7 a.m..
 8 Q Did you ever stay later than
 9 3:30p.m.
 10 A No.
 11 Q What months and year was this?
 12 A I don't remember, but, my Counsel
 13 has all that information in her records.
 14 Q I don't want you to tell me
 15 anything you told your attorney, but, did you
 16 provide any information that said what months
 17 you worked?
 18 MS. ROSEN: Mr. Interpreter, what
 19 was that.
 20 A It was in the year.
 21 THE INTERPRETER: I didn't finish
 22 his answer.
 23 CONTINUED EXAMINATION BY:
 24 MS. ROSEN:
 25 Q What year was it?

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1 WILDER RODRIGUEZ
 2 A It's been since then approximately
 3 four years, but I can't remember the precise
 4 date.
 5 Q Do you remember the months?
 6 A No.
 7 Q Do you remember whether it was cold
 8 or hot?
 9 A Cold.
 10 Q How did you get this job?
 11 A Well, it was Sergio who told us it
 12 was a lot of jobs available and they needed
 13 brick installers.
 14 Q How did you know Sergio?
 15 A Well, he's a Spanish guy, of
 16 Spanish decent and he has a lot of friends.
 17 Q How do you know Sergio? With all
 18 due respect, you don't know every Spanish person
 19 in Brooklyn or Queens and New York City.
 20 I'm Jewish and I'm assuming the
 21 interpreter is Jewish from looking behind him,
 22 and we didn't know each other before today.
 23 How did you know him?
 24 Telling me you're both Spanish
 25 doesn't answer that question.

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1 WILDER RODRIGUEZ
 2 A He was a person in charge at that
 3 Yonkers job site and I was just passing by and I
 4 asked him, do you have any available jobs? And
 5 he said, yes, I do. There's a lot of work to do
 6 in this building and we need brick installers.
 7 So I said, well, I'm available. So I said,
 8 okay, and I started to work.
 9 Q Where did you live at the time you
 10 were working at this job?
 11 A 247 Cumberland Street, Brooklyn,
 12 New York 11205.
 13 Q How long have you been at that
 14 address?
 15 A Twenty years.
 16 Q What were you doing in Yonkers when
 17 you passed by this job site?
 18 What brought you to Yonkers when
 19 you passed by the job site and asked Sergio for
 20 a job?
 21 A All I did was go to visit a
 22 relative of mine, that's all.
 23 Q Who is the relative that you
 24 visited?
 25 A Well, I had a lot of friends, Jesus

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1 WILDER RODRIGUEZ
 2 and his sons were there and I do have the year
 3 or the date of that time that I worked there,
 4 06/26/2019. Jesus De La Sierra, Juan De La
 5 Sierra and Ramon Jose Morales.
 6 [The requested portion of the
 7 record was read back.]
 8 CONTINUED EXAMINATION BY:
 9 MS. ROSEN:
 10 Q You went to visit these gentlemen
 11 at the project or at their home or somewhere
 12 else?
 13 A It was a family visit.
 14 Q You're related to these four
 15 gentlemen?
 16 A No, just friends. Co-workers. We
 17 worked at the same building.
 18 Q The Yonkers building?
 19 A Yes.
 20 Q Did you know them before you worked
 21 at the Yonkers building?
 22 A No, no. That's where we met in
 23 Yonkers.
 24 Q My original question was, what were
 25 you doing in Yonkers and you told me you went to

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1 WILDER RODRIGUEZ
 2 visit friends and family and gave me these four
 3 names.
 4 Who were you visiting in Yonkers?
 5 A Well, I went to visit a family
 6 member, a relative, but the names I gave you are
 7 of those of co-workers that I worked with in
 8 Yonkers.
 9 Q Who was the family members that you
 10 went to visit?
 11 A It was an uncle of mine.
 12 Q What was your uncle's name?
 13 A Pedro.
 14 Q What is Pedro's last name?
 15 A Rodriguez.
 16 Q How far away from the Yonkers
 17 project did Uncle Pedro live?
 18 A Close. Very close. I have no
 19 idea, but we were just passing by.
 20 Q Were you passing by walking or
 21 driving or something else?
 22 A Walking.
 23 Q And you were walking with your
 24 uncle or someone else?
 25 A No, just by myself.

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1 WILDER RODRIGUEZ
 2 Q So you went to visit your uncle,
 3 you're walking by the job site and you stopped
 4 and asked Sergio if they need anymore help,
 5 correct?
 6 A Yes.
 7 Q He tells you yes and you start
 8 right then or you come back another day or
 9 something else?
 10 A Yes.
 11 Q That wasn't a yes or no question.
 12 Did you start the same day that you
 13 met Sergio?
 14 A No, on a different day.
 15 Q Did you talk to Sergio about what
 16 your pay was going to be?
 17 A Yes.
 18 Q What was the pay?
 19 A He told me that they were going to
 20 pay \$35 per hour in cash.
 21 Q How long after that day did the
 22 start?
 23 A The following day.
 24 Q How did you get from your home in
 25 Brooklyn to the project in Yonkers?

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1 WILDER RODRIGUEZ
 2 Do you have a car or did you take
 3 the subway or something else?
 4 A By car.
 5 Q Did you travel with anyone?
 6 A No, just me.
 7 Q A few minutes ago when you were
 8 giving me the names of some of your co-workers
 9 you mentioned a date, June 26, 2019.
 10 What is that date?
 11 A That was the year when I worked for
 12 that company in Yonkers.
 13 Q Did you look at something,
 14 paperwork or your phone or anything else that
 15 helped you remember June 26, 2019?
 16 A Yes, I do have pictures when we
 17 used to sign.
 18 Q And you were looking at those
 19 pictures that helped you remember the date?
 20 A Yes, there in my phone.
 21 Q I'm going to call for the
 22 production of those photos that you were looking
 23 at and again, I'm going to remind you if during
 24 the course of this deposition you look at
 25 anything, you need to tell me that you looked at

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1 WILDER RODRIGUEZ
 2 something and that's what's refreshing your
 3 recollection.
 4 MS. ERRINGTON: I believe those
 5 photos were actually already produced, you
 6 should have those.
 7 MS. ROSEN: Okay. To the extent
 8 they weren't.
 9 MS. ERRINGTON: I will look again
 10 obviously. I believe you already have
 11 them.
 12 MS. ROSEN: Okay.
 13 CONTINUED EXAMINATION BY:
 14 MS. ROSEN:
 15 Q Do you recall how many weeks you
 16 worked at the project?
 17 A I don't remember that well enough,
 18 but I did work for them.
 19 Q Were you ever paid at all?
 20 A Well, yes, they paid a little
 21 amount. A small amount. They always paid a
 22 small amount, but that's the way they paid us.
 23 Q What is a small amount?
 24 What would you receive?
 25 A I don't remember the amount. But,

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1 WILDER RODRIGUEZ
 2 they used to pay us for a certain time and then
 3 they ran out of cash, and they kept on promising
 4 we will pay you, the whole amount we owe you, we
 5 will pay you.
 6 Q That raises a lot of questions.
 7 How much did you expect to get paid
 8 per week?
 9 A I don't remember.
 10 Q So you don't remember how much you
 11 were expecting to get paid and you don't
 12 remember how much you actually got paid, is that
 13 correct?
 14 A We were supposed to get \$35 per
 15 week and we just got half of that. \$35 per hour
 16 and we just got half of that amount and they
 17 kept on telling us, you'll get the rest, the
 18 remaining next week. And we agreed to stop
 19 working because we didn't have the means to pay
 20 for the transportation to the job site.
 21 Q Now you're saying you got half
 22 every week, is that correct?
 23 A Not half. They gave us something.
 24 Q Who would you give you this money.
 25 A Sergio.

1 WILDER RODRIGUEZ
 2 even made those calls in relation to our need of
 3 getting paid.
 4 Q How do you know this? Did you hear
 5 the phone calls?
 6 A He used to call. Well, on
 7 occasions that big boss used come to the job
 8 site with the money and the envelopes and used
 9 to hand them out to Sergio and Sergio paid us,
 10 but again, it was not a full payment.
 11 Q Who was the big boss?
 12 A Supposedly he was the owner of the
 13 company.
 14 Q Do you know his name?
 15 A No. I just know that Sergio was
 16 the person in charge.
 17 Q Can you describe what the big boss
 18 looked like?
 19 A I don't remember. I didn't see
 20 him. He didn't get to the job site.
 21 Q How many men worked for Sergio at
 22 this project?
 23 A Twenty. Around twenty individuals.
 24 Q Did you ever have to sign-in to the
 25 project like a log or a record book that you

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1 WILDER RODRIGUEZ
 2 Q It was on Fridays?
 3 A It was no specific day for that
 4 payment. On occasions it was on Friday, it
 5 could be on a Tuesday or even on a Wednesday as
 6 well.
 7 Q Are there any weeks that you're
 8 claiming you didn't get paid anything?
 9 A Yes.
 10 Q How many?
 11 A Two to three. I don't remember
 12 that very well.
 13 Q Who did you consider your boss at
 14 the project?
 15 Who told you what to do and where
 16 to go within the building or the site?
 17 A The person in charge was Sergio.
 18 Q Did you ever meet anyone else that
 19 you would call in charge other than Sergio?
 20 A No. Sergio used to make the call
 21 to the boss, to the owner and he was told where
 22 we had to go.
 23 Q How do you know Sergio would make
 24 calls to the boss?
 25 A He used to make phone calls. He

1 WILDER RODRIGUEZ
 2 were there for the day?
 3 A Yes.
 4 Q Where was that book or paper
 5 located?
 6 A At the shanty.
 7 Q Would you report to the shanty
 8 everyday before starting work?
 9 A Yes, and that's where we signed the
 10 paper.
 11 Q Did you sign out as well?
 12 Did you sign when you were leaving
 13 the project?
 14 A No.
 15 Q Was there anyone in the shanty when
 16 you went to sign in?
 17 A Yes, Sergio?
 18 Q So he would be there when everyone
 19 would sign-in and everyone would go to the site
 20 to start work?
 21 A Yes.
 22 Q Did you ever see Sergio get the
 23 money that he paid the twenty or so workers
 24 with?
 25 A Well, yes. We used to get the

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1 WILDER RODRIGUEZ
 2 envelopes and we used to check inside the
 3 envelope and the money that we was supposed to
 4 get was not there.
 5 THE INTERPRETER: He didn't get the
 6 question, counsel.
 7 CONTINUED EXAMINATION BY:
 8 MS. ROSEN:
 9 Q Did you ever see where Sergio got
 10 to envelopes from?
 11 A Well, supposedly it was the owner
 12 of the company who was the one who was supposed
 13 to bring those envelopes, but he never got to
 14 the job site. It was Sergio that went somewhere
 15 to pick them up.
 16 Q Did you ever go to an office of the
 17 company other than the shanty or the job site
 18 itself?
 19 A Yes. There was an office right
 20 there next to the shanty, and we went to the
 21 office once and we told them we wouldn't work
 22 anymore, and they knew the owner of the company.
 23 Q Who was in this office?
 24 A Supposedly it was the inspectors,
 25 the persons that were in charge of the building

1 WILDER RODRIGUEZ
 2 Q I understand. I'm asking if he
 3 remember the names. If he knows who these
 4 people are?
 5 A No.
 6 Q What about Jose Visnay,
 7 V-I-S-N-A-Y, obviously I'm spelling it in
 8 English?
 9 A No. I don't know.
 10 Q How about Jose Abato, A-B-A-T-O?
 11 A No.
 12 Q What about Alejandro Manuel Zapata
 13 Osorio?
 14 A No.
 15 Q Arturo Del Razo?
 16 A Del Razo, I don't know.
 17 Q What about Braulio Rolando
 18 Cashabamba Chango?
 19 A Oh yes, those guys work with me.
 20 Q When you say those guys, what do
 21 you mean? That was one person.
 22 A It was another, Flavio that used to
 23 work there.
 24 Q What about Braulio Rolando
 25 Cashabamba Chango reminds you of Flavio?

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1 WILDER RODRIGUEZ
 2 who used to inspect and look at what was doing
 3 in the building.
 4 Q Are there any names on the office
 5 building or the office door?
 6 A Yes, but I don't remember which
 7 name it was.
 8 Q Did you get the names of anyone
 9 that you spoke to that was inside this office?
 10 A No.
 11 Q Do you know a David Cuevas?
 12 A It seems to me he was one of the
 13 individuals at that office, but I don't
 14 remember.
 15 Q Do you know anyone by the name of
 16 Angel Quijada, Q-U-I-J-A-D-A?
 17 A No. I didn't know anyone by that
 18 name, but when we actually went to that office,
 19 they told us they were paying our company and
 20 they didn't understand why the company didn't
 21 pay us.
 22 Q What about John Palmer?
 23 A No, I don't know who that is.
 24 Well, I could have very well have met them, but
 25 I don't remember the names.

1 WILDER RODRIGUEZ
 2 A I got confused.
 3 MS. ROSEN: I need two, three
 4 minutes. Let's take a quick restroom
 5 water break.
 6 [A short recess was taken.]
 7 MS. ROSEN: Back on the record.
 8 CONTINUED EXAMINATION BY:
 9 MS. ROSEN:
 10 [The two-page document was hereby
 11 marked as Defendant's Exhibit A for
 12 identification, as of this date.]
 13 CONTINUED EXAMINATION BY:
 14 MS. ROSEN:
 15 Q Mr. Rodriguez, I'm showing you what
 16 we marked Defendant's Exhibit A to this
 17 deposition. I'll ask you to take a look at
 18 what's on your screen.
 19 A Yes.
 20 Q Is this the check that you
 21 testified about earlier?
 22 A Yes.
 23 Q Do you know who North Star
 24 Strategy, Inc was or is?
 25 THE INTERPRETER: Repeating the

29

1 WILDER RODRIGUEZ
 2 question for the witness.
 3 A I don't know where that company
 4 was, but that's the check that he gave me.
 5 Q Are you familiar with a company by
 6 the name of Vector?
 7 A No. The truth is, I don't know.
 8 Q Just turning your attention back to
 9 the exhibit on the screen for a moment, do you
 10 know whose signature that is on the check?
 11 A I don't know.
 12 MS. ROSEN: Thank you,
 13 Mr. Rodriguez. I have nothing else for
 14 today.
 15 (Whereupon, at 12:37 P.M., the examination was
 16 concluded.)
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1 WILDER RODRIGUEZ
 2 A C K N O W L E D G E M E N T
 3 STATE OF NEW YORK)
 4 :ss
 5 COUNTY OF NASSAU)
 6
 7 I, WILDER RODRIGUEZ, hereby certify
 8 that I have read the transcript of my
 9 testimony taken under oath in my
 10 deposition of; that the transcript is a
 11 true, complete and correct record of my
 12 testimony, and that the answers on the
 13 record as given by me are true and
 14 correct.
 15
 16
 17
 18 WILDER RODRIGUEZ
 19
 20 SUBSCRIBED AND SWORN TO
 21 BEFORE ME THIS DAY
 22 OF , 2022.
 23
 24 NOTARY PUBLIC
 25

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1 WILDER RODRIGUEZ
 2 I N D E X
 3 WITNESS EXAMINED BY PAGE
 4 W. RODRIGUEZ MS. ROSEN 5
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 15 E X H I B I T S
 16 DEFENDANT'S DESCRIPTION PAGE
 17 Exhibit A document 28
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1 WILDER RODRIGUEZ
 2 INFORMATION TO BE SUPPLIED
 3 DESCRIPTION PAGE
 4 1. Name of company employed by. 9
 5 2. Production of the photos the plaintiff was
 6 looking at during the deposition. 19
 7
 8
 9
 10 --oo0oo--
 11
 12
 13
 14
 15 MARKED FOR A RULING
 16 PAGE LINE
 17 NONE
 18
 19
 20
 21
 22
 23
 24 --oo0oo--
 25

1 WILDER RODRIGUEZ
2 C E R T I F I C A T E
3 S T A T E O F N E W Y O R K)

) ss.:

4 C O U N T Y O F N A S S A U)

5 I, KAREN BLAKE, a Notary Public
6 within and for the State of New York, do hereby
7 certify that WILDER RODRIGUEZ, the witness, whose
8 deposition is hereinbefore set forth, was duly
9 sworn by me and that such deposition is a true
10 record of the testimony given by the witness.

11 I further certify that I am not
12 related to any of the parties to this action by
13 blood or marriage; and that I am in no way
14 interested in the outcome of this matter.

15 IN WITNESS WHEREOF, I have hereunto
16 set my hand this 25th day of February, 2022

17 
18 KAREN BLAKE
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